

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2021-349-E

IN THE MATTER OF:

Joint Petition of Duke Energy Carolinas, LLC
and Duke Energy Progress, LLC to Request the
Commission to Hold a Joint Hearing with the
North Carolina Utilities Commission to
Develop Carbon Plan

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**MOTION FOR ADMISSION
*PRO HAC VICE***

The Carolina Industrial Group for Fair Utility Rates II (CIGFUR II) and Carolina Industrial Group for Fair Utility Rates III (CIGFUR III) (collectively, CIGFUR), by and through its undersigned local counsel, hereby moves the Public Service Commission of South Carolina (the Commission) to permit Christina D. Cress to practice *pro hac vice* before the Commission in the above-captioned matter. Pursuant to SCACR 404, Christina D. Cress, together with local counsel of record, has filed a Verified Application for Admission *Pro Hac Vice* with the South Carolina Supreme Court Office of Bar Admissions. A copy of her Application, as filed with the Supreme Court, is attached.

WHEREFORE, as the provisions set forth in SCACR 404 have been satisfied, CIGFUR requests this motion be granted.

Respectfully submitted, this the 13th day of December, 2021.

By: /s/ James H. Goldin
James H. Goldin (SC Bar No. 100092)
E-mail: jameygoldin@google.com
151 Meeting Street, Suite 600
Charleston, SC 29401
Telephone: (650) 224-9297
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Attorneys for CIGFUR

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*
IN THE STATE OF SOUTH CAROLINA**

IN RE:

**Joint Petition of Duke Energy Carolinas, LLC
and Duke Energy Progress, LLC to Request the
Commission to Hold a Joint Hearing with the North
Carolina Utilities Commission to Develop Carbon
Plan**

Docket No. 2021-349-E

**Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210**

Comes now Christina D. Cress, applicant herein, and respectfully represents the following:

1. Applicant resides at:

1108 Hymettus Court
Street Address
Raleigh Wake NC 27607
City County State Zip Code
919-607-6055
Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of)

Bailey & Dixon, LLP, with offices at
434 Fayetteville Street, Suite 2500
Street Address
Raleigh Wake NC 27601
City County State Zip Code
919.607.6055 919.699.2023 919.828.6592 ccress@bdixon.com
Primary Telephone Cell Phone Fax Number Email Address

3. Applicant has been retained personally or as a member of the above-named law firm by Carolina Industrial Group for Fair Utility Rates II and III (CIGFUR) to provide legal representation in Connection with the above case now pending before the above-named tribunal of the State of South Carolina.

4. Since the 28th of August, 2013, applicant has been, and presently is, a Member in good standing of the bar of the highest court of the District of Columbia or the State of North Carolina where the applicant regularly practices law. Attached is a certificate of good standing dated within the last 90 days from the bar of the highest court of the District of Columbia or the State where applicant regularly practices law.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:	Date Admitted:
Supreme Court of North Carolina	August 28, 2013
Western District of North Carolina	March 12, 2019
Eastern District of North Carolina	February 28, 2019
Middle District of North Carolina	March 13, 2019
United States Court of Appeals, Fourth Circuit	March 13, 2019

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below: (List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

N/A

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court date):

N/A

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/A

8. Applicant never has had any certificate or privilege to appear and practice before any court or administrative body suspended or revoked, except as provided below (give particulars, e.g., date, court, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is James H. Goldin
of Google LLC, which has offices at:

151 Meeting Street, Suite 600

Street Address

Charleston

Charleston

South Carolina

29401

City

County

State

Zip Code

404.487.9231

650.224.9297

jameygoldin@google.com

Primary Telephone

Cell Phone

Fax Number

Email Address

100092

South Carolina Bar Number

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

N/A

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above-named tribunal for this case only.

DATED this 13th day of December, 20 21.



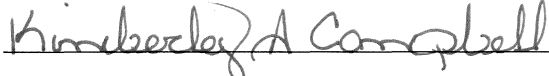
Christina D. Cress, APPLICANT

VERIFICATIONSTATE OF North Carolina)COUNTY OF Wake)

I, Christina D. Cress, do hereby swear or affirm under penalty of perjury that I am the applicant in the above-styled matter; that I have read the foregoing application and know the contents thereof; and that the contents are true of my own knowledge, except as to those matters stated on information and believe, and that as to those matters I believe them to be true. I understand that I am under a continuing duty to promptly update the information provided in the application until the tribunal has ruled on the motion for admission pro hac vice. Further, if the motion is granted, I understand that I am under a continuing duty to promptly update the information provided in the application as long as I continue to appear pro hac vice in the action or proceeding. Any updated information shall be provided to both the tribunal that granted the motion and to the tribunal in which the action or proceeding may then be pending.

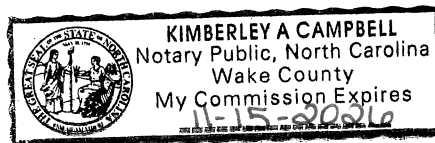

Christina D. Cress, APPLICANT/AFFIANT

Subscribed and sworn to before me this 13th day of December, 20 21



Notary Public for the State of North Carolina

My Commission Expires: 11-15-2026

**LOCAL COUNSEL CONSENT**

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 3rd day of December, 20 21


James H. Goldin, LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC, 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this

13th day of December, 20 21


Christina D. Cress, APPLICANT/AFFIANT

Supreme Court OF THE STATE OF NORTH CAROLINA



I, Amy L. Funderburk, Clerk of the Supreme Court of North Carolina, do hereby certify that on August 28, 2013, license to practice as an Attorney and Counselor at Law in all the Courts of this State was issued by the North Carolina Board of Law Examiners to

Christina Diane Cress

according to the certified list of licentiates reported by the Secretary of said Board and filed in my office as required by statute.

To the date of this certificate, no order revoking said license has been filed with this Court and no order suspending same is in effect.

WITNESS my hand and the Seal of the Supreme Court of North Carolina at office in Raleigh, this December 6, 2021.

A handwritten signature in cursive script that reads "Amy L. Funderburk".

Amy L. Funderburk
Clerk of the Supreme Court
of the State of North Carolina



STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

DOCKET NO. 2021-349-E

In the matter of:)	
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Joint Petition of Duke Energy Carolinas, LLC)	CERTIFICATE OF SERVICE
and Duke Energy Progress, LLC to Request the)	
Commission to Hold a Joint Hearing with the)	
North Carolina Utilities Commission to)	
Develop Carbon Plan)	

This is to certify that I have caused to be served this day one copy of the **Motion for Admission Pro Hac Vice** to the persons named below at the addresses set forth via electronic mail and/or e-filing:

Nanette Edwards
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nedwards@ors.sc.gov

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peter@energync.org

This the 13th day of December, 2021.

/s/ James H. Goldin
James H. Goldin